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Signed and Filed: November 19, 2019

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A handwritten signature in black ink, reading "Dennis Montali", is written over a horizontal line.

DENNIS MONTALI
U.S. Bankruptcy Judge

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*Counsel for Ad Hoc Group of Subrogation
Claim Holders*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088

Chapter 11

(Lead Case)

(Jointly Administered)

**ORDER RE: THE PRODUCTION OF
CURRENT ADDRESS INFORMATION
FOR INSURED**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the lead case, No.
19-30088 (DM)*

1 The Court, having considered the *Stipulation Re: the Production of Current Address*
2 *Information for Insureds* (the “**Stipulation**”),¹ entered into by the Official Committee of Tort
3 Claimants (the “**TCC**”), any fiduciary, if any, appointed to represent wildfire victims who have
4 not yet filed proofs of claim (the “**Claims Representative**”) and the Ad Hoc Group of
5 Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”), filed on November 18, 2019
6 in connection with the above-captioned chapter 11 cases pending before the United States Court
7 for the Northern District of California (the “**Chapter 11 Cases**”), pursuant to such stipulation
8 and agreement of the Parties, and good cause appearing,

9 **IT IS HEREBY ORDERED THAT:**

10 **1.** The Stipulation is granted.

11 **2.** The Information will be shared only with counsel for the TCC, the TCC’s
12 professionals retained in these bankruptcy cases, or the Claims Representative, and the Claims
13 Representative’s support staff, vendors or professionals for the Requested Purposes. Any
14 documents or spreadsheets produced that contain the Information for Requested Purposes shall
15 be designated “PROFESSIONAL EYES ONLY” for TCC Counsel, professionals, and the
16 Claims Representative.

17 **3.** The TCC and the Claims Representative agree that the Ad Hoc Subrogation
18 Group will receive drafts of any notifications they plan to send to insureds using the Information,
19 and that the Ad Hoc Subrogation Group will have an opportunity to review and comment on
20 those drafts.

21 **4.** The Information will not be shared with counsel for the individual plaintiffs, the
22 interests of which are represented by the TCC.

23 **5.** The Information will be used solely for the Requested Purposes and will not be
24 used for any other purpose, including but not limited to attorney advertisement, solicitations, or
25 promoting claims against insurers.

26 **6.** Given, among other things, (i) the short time period remaining until the Bar Date,
27 (ii) the burden that would be imposed on the TCC or the Claims Representative to attempt to
28

¹ Capitalized terms used and not defined herein shall have the meanings ascribed to them in the Stipulation.

1 obtain the Information from other sources, (iii) the limited number of sources available other
2 than the members of the Ad Hoc Subrogation Group to obtain this information, and (iv) the
3 potential harm to fire victims who do not file proofs of claim by the Bar Date, the Court
4 accordingly finds that a compelling need exists to order the production of this Information from
5 the members of the Ad Hoc Subrogation Group that outweighs any privacy interest the insureds
6 may have in that Information.

7 **7.** The members of the Ad Hoc Subrogation Group will undertake reasonable efforts
8 to provide such Information and shall not be held responsible in any way if any of the
9 Information is incorrect or incomplete. The Ad Hoc Subrogation Group reserves all rights to
10 object to any additional requests for insured information on any and all grounds.

11 **8.** In agreeing to provide the Information pursuant to the Stipulation and pursuant
12 to this Order, the members of the Ad Hoc Subrogation Group act reasonably, in good faith and
13 are advancing and protecting the interests of their insureds.

14 **9.** Nothing in the Stipulation or this Order approving the Stipulation shall diminish
15 or alter the obligations of the members of the Ad Hoc Subrogation Group set forth in the Order
16 (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and Manner of
17 Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and Other
18 Information to All Creditors and Potential Creditors (Dkt. No. 2806) entered on July 1, 2019,
19 which obligations remain in full force and effect.

20 **10.** This Court shall retain jurisdiction to hear and determine all matters arising from
21 or related to the implementation, interpretation or enforcement of this Order.

22
23 APPROVED AS TO FORM AND CONTENT:

24 Dated: November 18, 2019

25 WILLKIE FARR & GALLAGHER LLP

26 /s/ Benjamin P. McCallen
27 Matthew A. Feldman (*pro hac vice*)
28 Joseph G. Minias (*pro hac vice*)
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15
16 MICHAEL G. KASOLAS

17 /s/ Michael G. Kasolas

18 Michael G. Kasolas
19 Claims Representative

20 **** END OF ORDER ****